

MEMO ENDORSED

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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David E. Patton
Executive Director

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December 22, 2022

BY ECF

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/23/2022

**Re: United States v. Jeremy Lambert
21 Cr. 585 (VEC)**

Dear Judge Caproni:

I am the attorney for Jeremy Lambert, the defendant in the above-captioned case. I write to request an adjournment of the sentencing date, which is currently scheduled for January 10, 2023. The defense is currently awaiting numerous documents that are needed for Mr. Lambert's sentencing submission to ensure he receives the effective assistance of counsel at sentencing. In addition to the delays in receiving this important documentation, an adjournment would also accommodate my trial schedule and allow additional time for Probation to prepare the final presentence report – the draft of which was only just received yesterday. Accordingly, the defense is requesting a sixty-day adjournment. AUSA Matthew Shahabian does not object to this request for an adjournment. This is the first request for a sentencing adjournment.

Thank you for your consideration of this request.

Respectfully Submitted,

/s/ Marisa K. Cabrera
Marisa K. Cabrera, Esq.
Assistant Federal Defender
Tel.: (917) 890-7612

cc: AUSA Matthew Shahabian (by ECF)

Application GRANTED. Mr. Lambert's sentencing is hereby adjourned from Tuesday, January 10, 2023 at 11:00 A.M. until **Friday, March 17, 2023 at 2:30 P.M.** The deadline for pre-sentencing submissions is extended from Tuesday, December 27, 2022 until **Friday, March 3, 2023.**

SO ORDERED.

 12/23/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE